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16 Attorneys for Plaintiff VERNON UNSWORTH

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 VERNON UNSWORTH,

20 Plaintiff,

21 v.
22

23 ELON MUSK,

24 Defendant.
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27
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Case No. 2:18-cv-08048-SVW (JCx)
Judge: Hon. Stephen V. Wilson

**PLAINTIFF VERNON UNSWORTH'S
REQUEST FOR SPECIAL QUESTIONS
TO BE ASKED ON VOIR DIRE**

Pretrial Conference: Nov. 25, 2019
Time: 3:00 p.m.
Courtroom: 10A

1 Pursuant to the parties' proposed Joint Final Pretrial Conference Order [Dkt.
2 113], Plaintiff Vernon Unsworth hereby submits his proposed special questions to
3 be asked during voir dire, as follows.

4 1. Does anyone know Plaintiff, Vernon Unsworth?

5 2. Does anyone know anything about Mr. Unsworth's life other than the
6 fact that he is the plaintiff in this lawsuit?

7 3. Does anyone know Defendant, Elon Musk?

8 4. Does anyone know anything about Mr. Musk's life other than the fact
9 that he is the defendant in this lawsuit?

10 5. In June and July of 2018, 12 Thai boys and their soccer team coach
11 were rescued from a cave where they were trapped for weeks in Thailand. This
12 incident is commonly referred to as the Tham Luang Cave Rescue. Has anyone
13 heard or read anything about the cave rescue?

14 6. Mr. Unsworth claims in this lawsuit that Mr. Musk defamed him in
15 statements Mr. Musk published on Twitter on July 15, 2018. Has anyone heard or
16 read anything about this lawsuit?

17 7. At this time or in the past, have any of you, members of your family,
18 or any of your friends served as an officer, agent, director, employee, or
19 shareholder, or done business with, any of the following corporations:

20 a. Tesla, Inc., formerly Tesla Motors, Inc.;

21 b. SolarCity Corporation, a subsidiary of Tesla, Inc.;

22 c. PayPal Holdings Inc., also known as PayPal;

23 d. Space Exploration Technologies Corp., which does business
24 as SpaceX;

25 e. Neuralink Corporation;

26 f. The Boring Company (also known as TBC);

27 g. OpenAI LP or its parent organization, OpenAI Inc.;

28 h. Excession, LLC;

- 1 i. Foundation Security;
- 2 j. LaunchPad LA;
- 3 k. FabFitFun, Inc.;
- 4 l. Ridgley Walsh; or
- 5 m. American International Group, Inc, also known as AIG Insurance
- 6 Company.

7 8. Has anyone ever done business with, or been a party to, any business
8 relationship with any of those corporations?

9 9. Does anyone have any strong feelings one way or the other about any
10 of those corporations?

11 10. Does anyone own, or have you ever considered buying, a Tesla car?

12 11. Does anyone own, or have you ever considered buying, an electric car
13 regardless of the manufacturer?

14 12. Does anyone own, or have you ever considered installing, residential
15 or commercial solar roof panels?

16 13. Do you, members of your family, or any of your friends have a hobby
17 or special interest in space exploration or space travel, including interplanetary
18 travel?

19 14. Do you, members of your family, or any of your friends have a hobby
20 or special interest in the creation or development of artificial intelligence?

21 15. Do you, members of your family, or any of your friends have a hobby
22 or special interest in underground pedestrian or vehicular travel?

23 16. I will now read to you the names of individuals listed by the parties
24 who may testify at this trial, or who may be mentioned in testimony received from
25 other witnesses. Are you familiar with any of these individuals? If so, briefly state
26 the basis for your familiarity.

27 17. Who here has a college degree?

28 18. Who here has post-college graduate degree or has ever pursued

1 graduate studies but did not for whatever reason receive a graduate degree?

2 19. Do you, members of your family, or any of your friends have any
3 education, training, experience, or a degree in the law or legal-related fields?

4 20. Does anyone have any personal or secondhand knowledge about libel
5 or defamation disputes?

6 21. Have you, members of your family, or any of your friends ever been
7 involved in a legal dispute as a lay or expert witness?

8 22. Has anyone ever been a party in civil litigation?? If yes, state: (a)
9 whether you were a plaintiff or a defendant; (b) the nature of the case; (c) the
10 outcome of the case, and (d) whether you were satisfied or dissatisfied with the
11 outcome.

12 23. Has anyone ever served as a juror? If yes, state: (a) whether you served
13 on a civil case or criminal case; (b) the nature of the case; (c) the outcome of the
14 case, if you remember; and (d) whether you served as the foreperson.

15 24. Do you, a family member, or close friend know anyone who is a
16 partner, employee, or client of the law firm of Quinn, Emanuel, Urquhart & Sullivan
17 LLP, also known as Quinn Emanuel?

18 25. Has anyone ever seen any advertising for the legal services of Quinn,
19 Emanuel, Urquhart & Sullivan LLP, or Quinn Emanuel?

20 26. Do you, a family member, or a close friend know anyone who is a
21 partner, employee, or client of the law firm of Hueston Hennigan LLP?

22 27. Do you, a family member, or a close friend know anyone who is a
23 partner, employee, or client of the law firm of Cooley LLP?

24 28. Do you, members of your family, or any of your friends work for or
25 have any connection to Twitter, including having a Twitter account?

26 29. Do you, members of your family, or any of your friends have an
27 Instagram account?

28 30. Do you, members of your family, or any of your friends have a

1 Snapchat account?

2 31. Do you, members of your family, or any of your friends have a
3 Facebook account?

4 32. Do you, members of your family, or any of your friends have a
5 LinkedIn account?

6 33. Do you, members of your family, or any of your friends have a Tumblr
7 account?

8 34. Do you, members of your family, or any of your friends have a Tik
9 Tok account?

10 35. Does anyone here follow Elon Musk on Twitter or on the Internet?

11 36. Have you heard or read anything about Elon Musk's use of Twitter?

12 37. Does anyone feel that what people tweet on Twitter should be treated
13 differently than statements published elsewhere?

14 38. Would anyone here be reluctant to award compensatory damages to
15 Mr. Unsworth even if you find by a preponderance of the evidence that Mr. Musk
16 negligently published false and defamatory statements about Mr. Unsworth on
17 Twitter?

18 39. Would anyone here be reluctant to award punitive damages to Mr.
19 Unsworth even if you find by clear and convincing evidence that Mr. Musk
20 published false and defamatory statements about Mr. Unsworth on Twitter with
21 malice and a reckless disregard for truth or falsity?

22 40. Do you, your family, or anyone close to you have connections to
23 Thailand?

24 41. Do you have any thoughts about Thai tourism or travel to Thailand?

25 42. Does anyone on the panel feel that there are too many lawsuits?

26 43. Does any member of the panel have strong feelings one way or the
27 other about the financial value of a person's reputation?

28 44. Does anyone have strong feelings that First Amendment protection of

1 speech is more important than state or federal defamation laws which seek to protect
2 a reputation?

3 45. Has anyone ever owned a small business?

4 46. Does anyone have strong feelings either way regarding the idea that
5 corporations often take advantage of individuals and small businesses?

6 47. Does anyone have any special disability, medical condition, or other
7 problem that would impose an undue hardship on you if you are selected to serve
8 as a member of the jury? It is estimated that this trial may last through Monday of
9 next week.

10 48. Is there any information that you wish to bring to my attention that
11 might affect your ability to serve as a juror in this case?

12 49. Is there any information that you wish to bring to my attention that
13 might affect your ability to serve as a fair and impartial juror in this case and decide
14 the case on the evidence?

15 50. Is there any information that you wish to bring to my attention that you
16 would ask be provided to the Court in the privacy of chambers?

17 Dated: November 21, 2019 L. LIN WOOD, P.C.
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19 By: /s/L. Lin Wood

20 L. Lin Wood

21 ***Attorneys for Plaintiff Vernon Unsworth***
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